



eConnect

EHR Incentive Program Newsletter

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Updates on Program Year 2020

Maryland Medicaid has completed reviewing attestations for Program Year 2020. Eligible Professionals (EPs) who were unable to submit their attestations or those who did not meet the guidelines to pass for Program Year 2020 are encouraged to attest for Program Year 2021.

Post-Payment Auditing

Maryland Department of Health's contractor, Myers & Stauffer LC (MSLC), has begun Program Year 2019 post-payment audits. As a reminder, please continue to save documents to support submitted attestations. Documentation should be retained for six years post-attestation. EPs who were selected for a post-payment audit should continue to provide MSLC with the requested documentation.

Program Year 2021 Dates

As the Centers for Medicare and Medicaid Services (CMS) Promoting Interoperability Program sunsets in 2021, the time period to attest between the remaining program years has shortened. In preparation for the program's end, Maryland Medicaid intends to open up/unlock eMIPP for Program Year 2021 on **August 01, 2021** and close by **October 01, 2021**. EPs that are eligible to attest will need to select a 90-day EHR reporting period that falls between January 01, 2021 and July 31, 2021. Maryland Medicaid will send notice when Program Year 2021 opens and if any changes in dates occur.

Preparing for Program Year 2021

With Program Year (PY) 2021 around the corner, here are some tips to help prepare attestations:

- To participate, EPs should be utilizing a 2015 Edition Certified Electronic Health Record Technology (CEHRT) to meet Stage 3 requirements.
- Conduct a complete security risk assessment (SRA) within the calendar year of 2021. Please use the [SRA Checklist](#), which includes a link to the ONC's recently updated version of the [SRA Tool](#). MDH is requesting EPs to submit the PY 2021 SRA in eMIPP during the open attestation period. If EPs do not have the updated/reviewed SRA at that time, MDH is requiring that EPs submit in writing, a statement on their organization's letterhead indicating that the completed SRA will be provided upon request during post-payment audits by MSLC. EPs may face the potential recoupment of the incentive payment if the SRA is not provided and/or if the SRA does not meet guidelines upon post-payment audit review.
- Have your eMIPP login credentials ready before uploading materials into [eMIPP](#). If you are attempting to log into eMIPP with your correct credentials and are encountering a "Warning: User not Active" error message, you most likely need to update/reset your password via [eMedicaid](#). Once the password is updated, use the same login credentials to log into eMIPP.
- The Patient Volume (PV) reporting period selected and PV report must be a 90-day period within the calendar year preceding 2021.
- Choose a 90-day EHR reporting period where ALL objectives and measures are met and/or where the proper exclusions are claimed.
- Submit eQMs to CRISP and upload the associated eQm EHR generated report in eMIPP. CRISP is pleased to announce that manual submission of eQMs for PY 2021 will take place using an e-form on the CRISP Unified Landing Page (ULP). This will simplify the entry process significantly. The CALiPR process used in PY 2020 will still be available if a provider chooses to upload a QRDA-III file of CQM data, but the manual submission process through the e-form is encouraged. If you experience issues with reporting your eQMs and need to submit a help ticket to CRISP [by emailing support@crisphealth.org], please make sure to mention it is for Medicaid eQm submission and let them know whether you are using CALiPR or the eQm reporting form.
- If you have questions about eligibility, please email the EHR Incentive Program Team at mdh.marylandehr@maryland.gov.

Meaningful Use (MU) Stage 3 Objectives and eQMs for Program Year 2021

Please refer to the Meaningful Use (MU) Stage 3 Objectives and requirements found in our previous [eConnect](#). The Stage 3 Specification Sheets for [EPs](#) are also available at CMS for reference.

Electronic Clinical Quality Measures (eQMs)

The [Calendar Year \(CY\) 2021 Physician Fee Schedule Final Rule](#) was placed on display at the Federal Register on December 2, 2020. The final rule contains a section that pertains to the Medicaid Promoting Interoperability Program (EHR Incentive Program).

Under this final rule CMS:

- Amends the list of available eQMs for the CY 2021 performance period to align the eQMs available for Medicaid EPs in 2021 with those available for MIPS eligible clinicians for the CY 2021 performance period. Specifically, the eQMs available for Medicaid EPs in 2021 will consist of the list of quality measures available under the eQCM collection type on the list of quality measures established for the MIPS CY 2021 performance period, which can be found in Appendix 1.
- Will again require (as we did for 2020) that Medicaid EPs report on any six eQMs that are relevant to their scope of practice, regardless of whether they report via attestation or electronically.
- Will again require (as we did for 2020) that Medicaid EPs report on at least one outcome measure (or, if an outcome measure is not available or relevant, one other high priority measure). If no outcome or high priority measures are relevant to a Medicaid EP's scope of practice, the clinician may report on any six eQMs that are relevant, as was the policy in 2020.
- Finally, we note that the eQCM reporting period in 2021 for EPs in the Medicaid Promoting Interoperability Program is a minimum of any continuous 90-day period within CY 2021.

End of Promoting Interoperability Program

Program Year 2021 will be the last year EPs will be able to attest for the EHR Incentive Program. EPs who began and received payment prior to PY 2016 can participate in remaining program years, up until PY 2021. EPs are eligible to receive up to six payments total. EPs who attest for Program Year 2021 will undergo a post-payment audit. Remember to maintain hard and electronic copies of all supporting documentation for submitted attestations.

As the EHR Incentive Program sunsets at the end of 2021, as of now Maryland Medicaid will not be participating in any other incentive payment programs. Future correspondence will be provided if there are any changes with this information.

If you have questions or concerns, please contact our Meaningful Use Support team at CRISP at support@crisphealth.org or call 877-952-7477.

To view more information about the requirements for Program Year 2021, please visit the CMS Meaningful Use [website](#).